

CIVIL ACTION NO. 3:13-cv-46

CONSENT MOTION FOR PROTECTIVE ORDER

commercial information. Furthermore, this information is not available to, and not disseminated to, the general public.

4. Accordingly, the Plaintiff and Defendants have agreed to the attached Consent Protective Order to ensure that such asserted confidential and privileged information will not be used for any purpose other than this action, and will not be made public or otherwise be disseminated beyond the extent necessary for purposes of this action and in accordance with the proposed Consent Protective Order.

5. Counsel for Plaintiff and Defendants have consented to the proposed Consent Protective Order submitted with this Motion. This will allow the aforementioned 30(b)(6) deposition of TIAA-CREF to proceed without delay.

6. The Fourth Circuit has recognized that a Protective Order may be granted to limit public access to “business information that might harm a litigant’s competitive standing.” *Woven Electronics Corp. v. Advance Grp., Inc.*, 930 F.2d 913 (4th Cir. 1991) (unpublished) (citing *Nixon v. Warner Communications, Inc.*, 435 U.S. 589, 598 (1978)).

WHEREFORE, the Parties respectfully request that this Consent Motion for Protective Order be allowed, and that the proposed Consent Protective Order be entered by the Court.

This the 11 day of April, 2014.

CRANFILL SUMNER & HARTZOG LLP

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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day served the attached Consent Motion for Protective Order on all of the parties to this cause by electronically filing it with the Clerk of Court using the CM/ECF system which emailed it to the following:

Charles Ali Everage
Everage Law Firm, PLLC
1800 Camden Road, Suite 104
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This the 11 day of April, 2014.

CRANFILL SUMNER & HARTZOG LLP

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